

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF NEW YORK

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UNITED STATES,

Plaintiff,

v.

**NOTICE OF MOTION**

Criminal Action No.: 5:18-CR-185  
(NAM)

KAMAR BOATMAN,

Defendant.

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Motion By:

Kristen E. Smith, Esq.  
Corporation Counsel

By: Todd M. Long, Esq.  
Assistant Corporation Counsel  
Federal Bar Roll No.: 519301

Time and Place of Hearing:

\_\_\_\_\_, 2019 at \_\_:\_\_\_ a.m./p.m.  
before Senior Judge Norman A. Mordue to  
be held at the United States District  
Courthouse in Syracuse, New York.

Relief and Basis:

Motion to Quash Defendant Kamar  
Boatman's Judicial Subpoena Pursuant to  
Fed. Rules Crim. Pro Rule 17(c)(2).

-or-

In the alternative, accordingly modify the  
Subpoena with reasonable and unoppressive  
terms with a reasonable deadline deliverable  
before this Court; and an *in camera* review  
of the narrowed subject matter be conducted  
for the controlled protection of law  
enforcement privileged documents; and any  
other relief that this Court deems just and  
proper.

Supporting Papers:

Declaration of Todd M. Long, Esq., with  
and exhibit attached thereto, Affidavit of  
Det. Mark Rusin, and Memorandum of Law.

Dated: March 15, 2019

Kristen E. Smith, Esq.  
Corporation Counsel

/s/

By: Todd M. Long, Esq.  
Assistant Corporation Counsel  
Bar Roll No. 519301  
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